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STATE OF KANSAS



HRI

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

July 3, 1989

Mr. Chuck Trombold
General Manager
Hydrocarbon Recyclers, Inc.
2525 North New York
Wichita, KS 67219

Re: Hazardous Waste Compliance Inspection
EPA ID Number KSD007246846

Mr. Trombold:

On June 21, 1989, an inspection of your TSD facility was conducted by this department to determine compliance with hazardous waste regulations.

The inspection revealed your facility generates and/or stores the following hazardous wastes as defined by 40 CFR 261, referenced by K.A.R. 28-31-3:

	Wastes Generated	Waste Codes
1.	chlorinated solvents	F001/F002
2.	perchloroethylene-containing wastes: carbon, dry cleaning cartridge filters, and water	F002
3.	non-chlorinated listed solvents & solvent-paint mixtures	F003/F005
4.	ignitable solvents and solvent-paint mixtures	D001
5.	oxidizers (Class 1 and 2)	D001
6.	corrosives	D002/D007
7.	paint solids	D005/D006/D007/D008
8.	non-blendable wastes	D001/D004/D007/D008/F006/F024



R00001621

RCRA Records Center

The quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. Your facility is, therefore, regulated under 40 CFR, Part 262 as adopted by K.A.R. 28-31-4. In addition to being an EPA generator, your facility is regulated as a TSD under interim status, and is subject to 40 CFR 265 (K.A.R. 28-31-8).

The inspection identified the following items not in compliance with regulations concerning generators of hazardous waste and hazardous waste treatment,

Mr. Chuck Trombold
July 3, 1989
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storage, and disposal TSD facilities:

1. Each container or tank in which hazardous waste is accumulated must be marked clearly or labeled with the words, "Hazardous Waste" in accordance with K.A.R. 28-31-4. The 80 gallon tank, used for storage of perchloroethylene-contaminated water in the sparging room, needed a label. Also, there was an unidentified drum about a third full located at the southeast corner of the tank processing area. This was later found to contain rainwater which accumulated in empty drums and was consolidated into this drum. Since the drum is to be handled as hazardous waste, it needed a label. Lastly, the accumulation drum in your lab needed a label.
2. Your hazardous waste containers must be in good condition in accordance with 40 CFR 265.171, as referenced by K.A.R. 28-31-4. During our tour of Warehouse C, we found five drums exhibiting small seeps. We also found two drums with bulged lids, at least two severely dented, and at least another two excessively rusted. These drums need to be repackaged into good containers immediately.
3. According to 40 CFR 265.177(c) a storage container holding hazardous waste that is incompatible with any other waste or other material stored nearby in other containers, must be separated from the other waste or materials or protected from them by means of a dike, berm, wall, or other device. You had a waste drum with pH 1 stored next to a drum with pH 12 at your truck unloading area.

Also, I'm uncertain as to whether the perchloroethylene you sparge from dry cleaning cartridges should be considered hazardous waste. Is this material sent to another location for further recycling, or is it sold as is? Could you explain in detail what becomes of it? It may be your 80 gallon tank for storage of perchloroethylene (located next to the spargers) should also be considered a hazardous waste accumulation tank.

Lastly, we recommend keeping total drum count in the area north of the tank process area, to 36 (including partials). If the count exceeds that, it becomes difficult to calculate if you've exceeded your total allowable storage for this area (total storage allowed: 36 drums—assuming all full).

Items #1 through #3 above should be corrected immediately. No later than July 26, 1989 please send written documentation verifying these items have been corrected. Also, please explain how the perc handling practices. Your cooperation with the Hazardous Waste Management Program is appreciated. If you have questions please call me at (316) 838-1071.

Sincerely,

Dale T. Stuckey
Dale T. Stuckey

Kansas Department of Health and Environment
1919 Amidon, Wichita, KS 67203

c: Tom Gross
J.P. Goetz

RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST

A. General

Date 6-21-89 Time 0930 EPA ID No. KSD007246846
 Facility Name Hydrocarbon Recyclers, Inc.
 Street 2525 New York
 City Wichita, Kansas Zip 67219
 County Sedgwick Phone 316-267-5742
 Contacts David Trombold
Chuck Trombold—General Manager
 Inspector Dale T. Stuckey, Teresa Hansen, Martin West
 Other _____

B. Hazardous Waste Determination

1. Does generator generate waste(s) listed in 261.31, 261.32, or 261.33? ((YES))NO
 If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart D, and quantity/month:

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
F001, F003, F005, D001	solvent-based waste blended for kiln fuel	* 44,000 gals	Systech
F001, F002	chlorinated solvent for recycle	* 24 drums	HRI, Tulsa
F003, F005, D001	non-chlorinated solvent for recycle	* 88 drums	" "
F007, D001	flammable waste—water for deep well	* 93 drums	HRI, Tulsa
F002	perchloroethylene	2000 gal/6 mths	" "
F002	sparged dry cleaning carbon	60 dms/yr	either Systech or Envirotrol
F002	stripped dry clean-	15 cu yds/yr	USFCI

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date 6-21-89 Time 0930 EPA ID No. KSD007246846

Facility Name Hydrocarbon Recyclers, Inc.

Street 2525 New York

City Wichita, Kansas Zip 67219

County Sedgwick Phone 316-267-5742

Contacts David Trombold
Chuck Trombold—General Manager

Inspector Dale T. Stuckey, Teresa Hansen, Martin West

Other _____

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<input type="checkbox"/> Chem/Phys/Bio Treatment	<input checked="" type="checkbox"/> Drums	<input type="checkbox"/> Incineration
<input type="checkbox"/> Filtration	<input type="checkbox"/> Pile	<input type="checkbox"/> Landfill
<input type="checkbox"/> Incineration	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Recycling/Recovery	<input checked="" type="checkbox"/> Tank, Above ground	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Tank, Below ground	<input type="checkbox"/> Other ()
<input type="checkbox"/> Solvent Recovery	<input type="checkbox"/> Other ()	
<input type="checkbox"/> Thermal Treatment		
<input type="checkbox"/> Volume Reduction		
<input type="checkbox"/> Waste Oil		
<input type="checkbox"/> Other ()		

FO05, D001, D008	ing cartridges paint solids for incineration	* 63 dms	Rollins
FO01, FO02	wastewater for deep well	700 gal/mnth	HRI, Tulsa

* Figures for month of May 89

SEE ATTACHED COPY OF THEIR WASTESTREAM CHANNELING FLOWCHART FOR FURTHER INFO

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? ((YES))NO

- a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
D002, D007	corrosive waste for landfill	* 230 drums	USPCI

* Figures for month of May 89

- b. Does generator determine characteristics by testing or by applying knowledge of processes? Explain below:

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, 261.24 or was equivalent test method used? YES NO

- a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator? ((YES))NO

- a. If yes, list below:

Waste Description	Disposal Method
waste oil	HRI, Tulsa
water soluble oil	HRI, Tulsa

- b. Did the generator test these wastes to determine if hazardous? YES NO
Explain if necessary:

4. Generator size classification:

SQ (<25 kg/month) KG (25 - 100 kg/month)
EPA SQ (100 - 1000 kg/month) XX EPA (>1000 kg/month)

General Information * Indicates problems or potential problems

- There are 8 hazardous waste tanks located in the process area (see photo). Five of these are pressure tanks. Following is an inventory of the tanks:
 - Tank 1 is for storage of flammable water. This will eventually be deep wellled at Chem Resources in Tulsa (but first taken to HRI, Tulsa).
 - Tank 2 is for toluene, xylene wastestream for recycle at HRI Tulsa. This is an atmospheric tank.
 - Tank 3 is a blending solvent tank. Waste paint solvent from customers which is used to thin sludges during the blending process.
 - Tank 4 is a waste lacquer thinner (contains acetone) for recycle at HRI Tulsa.
 - Tanks 5 and 6 are both 21,000 gallon kiln fuel tanks. Hold blended waste to be sent to Lafarge/Systech. These are atmospheric tanks.
 - Tank 7 holds straight waste MEK.
 - Tank 8 holds waste liquids for incineration.

The tank process area is considered to have adequate secondary containment.

- There are no tanks on site for storage of corrosive wastes. These are all kept in containers.

- I was also told a 500 gallon tank of diesel #2 exists in the process area. It is used to assist the "drum dumper" device (located in area just north of the process area tanks).

- There are eleven other tanks at the west end of 'D' building (see map). These are all perched about 15' above ground on metal beams. All these tanks are part of the permit. The room in which these tanks are located was considered to have adequate secondary containment by the Trombols and Martin West.

- The contents of the Bldg. D tanks are as follows:

- Tank 9 contains F list contaminated water. Total F list contaminants less than 1%. Can be deep wellled under special land ban exemption (or national variance?) we were told.

- Tank 10 wastewater with greater than 1% F list contaminants.

- Tank 11 holds perc sparged out of the cartridges.

- Tank 13 holds waste TCE.

- Tank 14 is a bulk diesel fuel tank.

- Tank 15 is actually a series of four 2000 gallon waste oil tanks piped together, located at the north end of the west end of Bldg. D. This waste oil will get shipped to HRI.

- Tank 16 is a 9000 gallon storage tank for water soluble machine coolant oils. The water will be deep wellled. The oil will either be used for kiln fuel if BTU is high enough, or, will also be deep wellled.

- I was told tank testing for all tanks would be done in August. This will consist of tank thickness testing and visual inspection.

Following is the sequence of events once a shipment of HW is received

- Each incoming trailer is parked at the truck unloading area southeast of Warehouse C; the drums are visually inspected before unloading to check if there is any obvious discrepancy with the manifest, the drums are then unloaded on the ground in this area and sampled for confirmation analysis. If no problems are found the drums are either moved into the process area for immediate processing, or moved to

warehouse C. They prefer moving drums out to immediate processing, but in the case of drums with contents such as incineration material (drums other than just routine paint related waste), they have to be moved to temporary storage at Warehouse C.

—Each incoming drum is checked for specific gravity, pH, and solids content.

—Their new lab has two GC's, a Bomb? calorimeter (for checking flash), and a "sniffer" (photoionizer?).

—A composite sample is then taken according to specific gravity category. For instance, a composite sample (aliquot from each drum into one sample jar) will be taken from all drums in the .8 to .85 specific gravity range, another sample from all drums in the .86 to .9 specific gravity range, etc. Chloride test (Bielstein test) is run on all composite samples.

—They have found a strong correlation between specific gravity and BTU content. Alcohol is the only type waste that deviates from this correlation.

—Normally all wastes with specific gravity <.9 are kicked over to kiln fuel.

—85% of all wastes end up as kiln fuel.

—They do not blend into kiln fuel any waste with BTU value less than 8000. Less than that and they may send to HRI Tulsa, where their permit allows them to blend anything with BTU over 5000.

—It is most cost effective to recycle solvent, but if the solvent is non-recoverable, it must go as kiln fuel.

—Dry paint solids with no flash and no F list constituents may go to be landfilled at USFCI, Lone Mountain.

—Corrosive wastes go to USFCI landfill at Lone Mountain. There it is sent to a neutralization unit. No corrosives are landfilled directly. No liquids at all are put in landfill. Metal finishing type wastes are treated.

—Perc recovered from sparging operations is sent to HRI, Tulsa, for recycle.

—Sparged dry cleaning carbon will either be shipped to Systech or regenerated at Envirotrol, Pittsburgh, PA.

—In the sparging room, there are two 80 gallon holding tanks, one holds perc contaminated water and the other perc sparged out of the cartridges (see photo). The tanks are automatically pumped when level gets to about 50 gallons. The perc contaminated water is pumped to Tank 9 in Bldg. D. We were told these holding tanks were pumped out at least once per day. The perc contaminated water tank is considered hw and should be labeled. These holding tanks basically serve as an accumulation point. Over 50 gallons of a particular waste is never accumulated, thus a date is not needed.

manifests

—Reviewed a few manifests of both incoming and outgoing shipments. Saw no problems.

inspection logs

looked in order

Waste analysis

Martin has been in process of reviewing this and commenting back to them.

personnel training

OK.

contingency plan

OK

Operating record

Keep drum count on inspection logs.

closure plan

OK

Field Observations

—Total allowable number of drums on site is approx. 2400.

—David Trombold is no longer part owner of Service Chemical. Service Chemical is totally separate from HRI. Need to schedule visit to check if acid spillage problem noted at Service Chemical during the last inspection has been cleared up.

Building D, east part

—Lot of empty drums in storage here. Drums that held corrosives are washed out with power washer. Rinsate is collected for disposal in a tanker truck as corrosive hazardous waste.

Building D, south part (Sparging Room)

—3 drums of sparged carbon. labeled and dated.

—Marino bag containing smashed dry cleaning cartridges that have been sparged. Labeled. Also, another marino bag in process of being filled.

—6 dms filter cartridges awaiting sparging. Labeled.

—Took photo of sparging area. 3 spargers operational.

Building D, west end

Noticed cracks in floor. Trombolds said the floor had been coated with sealant.

Drum smasher machine located at SW corner Bldg. D

—All drums are washed out with stoddard solvent before being smashed (except for corrosive waste drums). The drum washer is located in the area north of the process tanks. Drums are smashed and placed in the trash dumpster if they are deemed to be unsuitable for reconditioning. SDS does reconditioning.

—Took a photo of this area.

* —There was an unlabeled and undated drum at the end of the conveyer line containing a dark liquid. Dave found out later this contained rainwater accumulated in open empty drums and consolidated. Recommended they keep all drums labeled as to identity.

Process tank area see photos

Total of 65 drums in process.

Area adjacent and north of tank process area

—This is where the drum emptier device, the blender, the drum washer, and the drums solids remover device are located. See photo. The drum solids remover is brand new and is not yet in operation.

—Dispersing takes place in blending tank (see photo); blending tank is drained every 24 hours. Still have capability of dispersing in drums also if need be.

* —thirty nine 55 gallon drums and 8 thirty gallon drums in this area, some only partial. They are approved for only 36 drums. We recommended they keep drum count below 36, even though some may only be partial.

—Sump full of water. Chuck said this would be pumped out at end of day and would be disposed as F list wastewater.

Hot room

—The hot room (see map) will be kept at a temperature of 150 °F. Viscous wastes such as wax will be placed in this room to lower viscosity before blending. No containers were in the hot room at time of this inspection.

Warehouse C see photos

* —Total count of hazardous waste drums about 980. Total count of non-hazardous waste drums about 230 (these are mostly ink).

* —Found five drums with small seeps including: 2 drums from Mid Continent Cabinetry, a drum from Plastic Fab and a unidentified drum next to it (label was on back side), and a drum from USPCI in Grassy Mountain Utah. See photos.

* —At least 2 bulged drums.

* —At least two severely dented drums and several minor dents.

* —At least 2 severely rusted drums.

* —One drum from Avery Graphics System with solvent on top looked like it seeped out of top bung.

* —Also drum from Ashland chemical containing 1,1,1 trichloroethane with pinhole leakage near the top.

Truck unloading area outside warehouse C

—There was a full trailer sitting at the ramp not yet unloaded, from USPCI Grassy Mountain.

—Drums are stored in this area for no longer than 2 days. Stay here temporarily while awaiting results of confirmation sampling.

—No real restrictions on quantity allowed to store here other than total 2400 drum allowance.

—4 van loads of drums in storage, total approx 300 to 350 drums. See photo.

* —Found a drum of PH 1 from DRMO stored next to drum of PH 12 from USPCI Grassy Mountain (PH checked by HRI personnel). PH 12 drum was also dented.

Corrosive storage building Bldg C

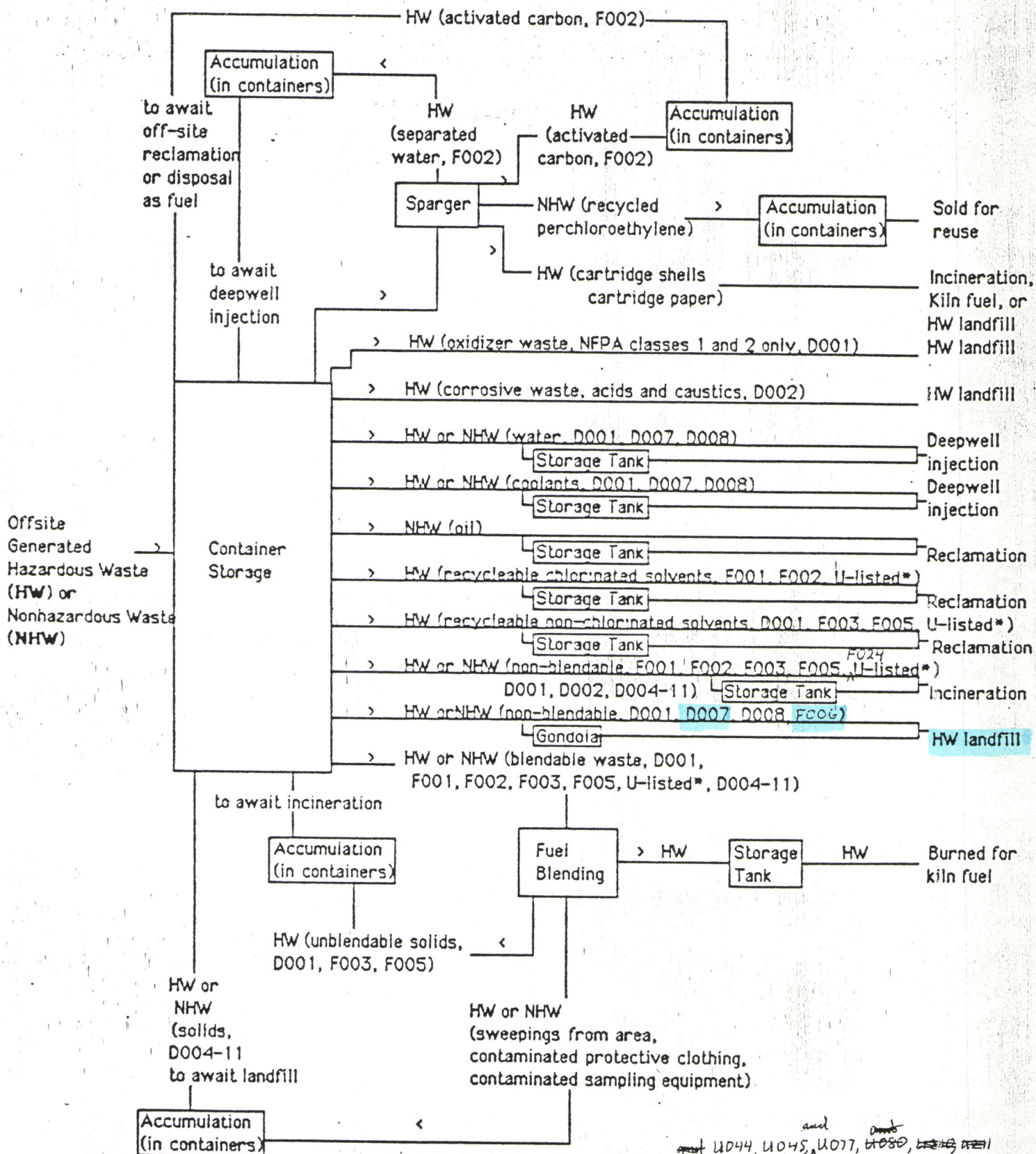
- 44 marino bags of corrosive rags from McClellan AFB.
- Caustic stored on north side, acid on south side.
- 300 corrosive drums total.

Lab, Bldg. E

- toured thru.
- * —Had a drum for accumulating samples after analysis. Needed hazardous waste label.

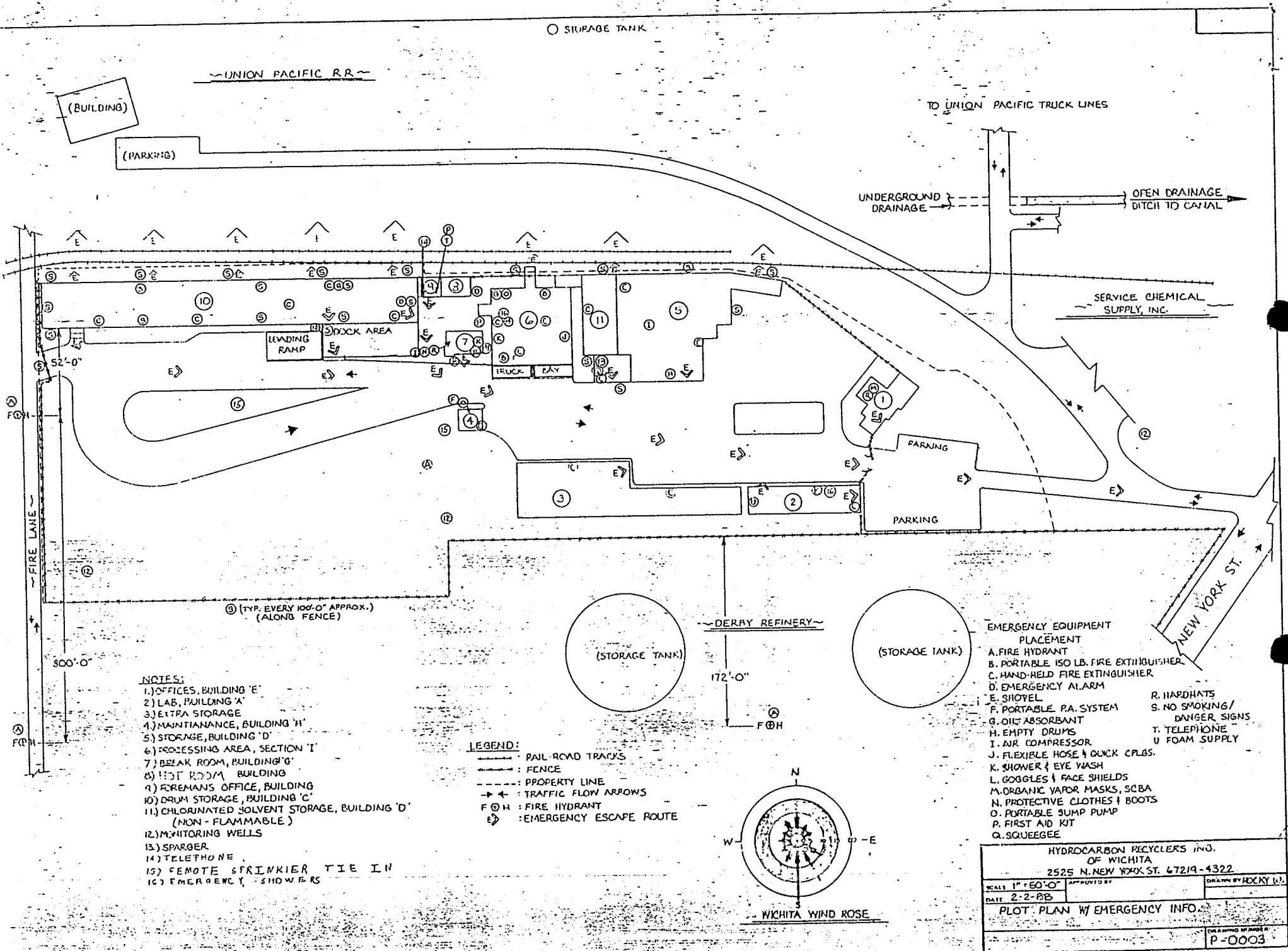
Figure 1.1
HRI WASTESTREAM CHANNELING

6/21/89



*only U-listed solvents that correspond to F001, F002, F003, and F005 solvents are accepted.

and not U044, U045, U077, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U100, U101, U102, U103, U104, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U134, U135, U136, U137, U138, U139, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U175, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U195, U196, U197, U198, U199, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U212, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U224, U225, U226, U227, U228, U229, U230, U231, U232, U233, U234, U235, U236, U237, U238, U239, U240, U241, 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Department of Health and Environment
Division of Environment
Northcentral District Office, Kansas
PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc.
Location: City Wichita County SG Legal: _____ S-____, T-____, R-____ E
W

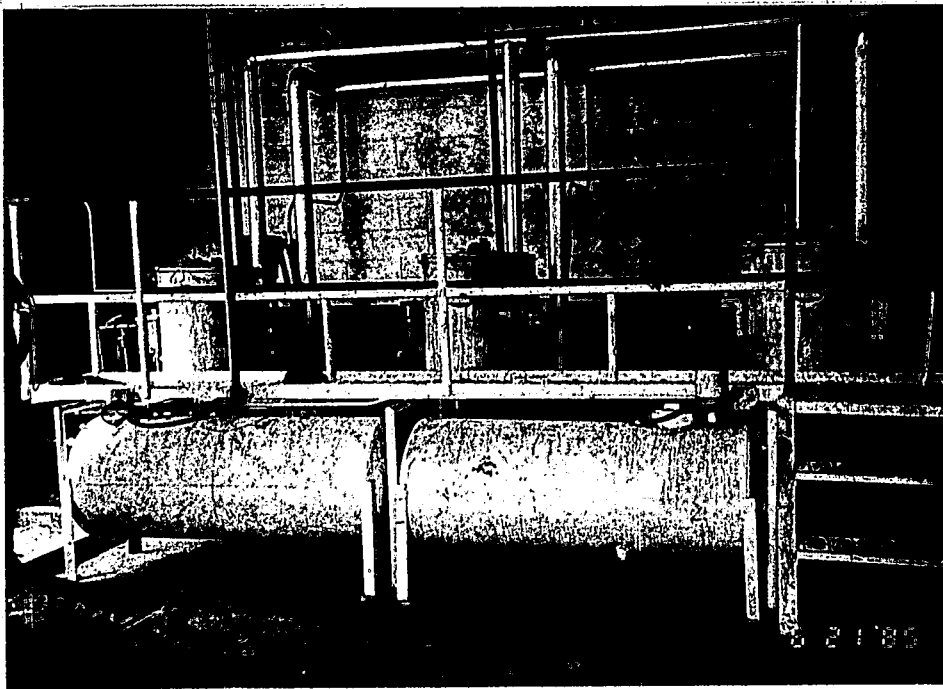


Photo No. 1 Time: _____ Hrs.
Date: 6-21-89 Day: _____
By: Dale T. Stuckey
General Direction Faced: North
Weather Conditions: _____
Type of Camera: _____
Minolta Freedom III
Comments: _____

Inside sparging room.
3 spargers in background.
Tank at left: perc-contaminated
water; tank at right: perc
sparged from cartridges

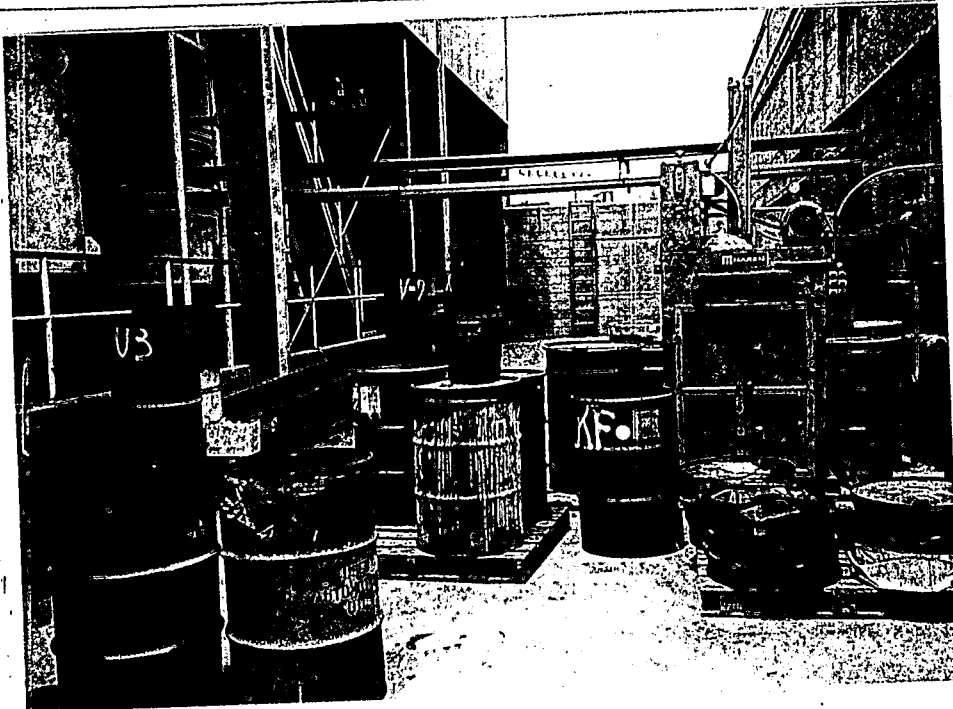


Photo No. 2 Time: _____ Hrs.
Date: 6-21-89 Day: _____
By: Dale T. Stuckey
General Direction Faced: North
Weather Conditions: _____

Type of Camera: _____
Minolta Freedom III
Comments: _____

Drum crushing area
at SE corner tank
processing facility

Department of Health and Environment
Division of Environment
Central District Office, Salt Lake City
PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc.
Location: City Wichita County SG Legal: _____ S-____, T-____, R-____ E
W



Photo No. 3 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: East

Weather Conditions: _____

Type of Camera: Minolta Freedom III

Comments: Inside tank processing area.



Photo No. 4 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: NE

Weather Conditions: _____

Type of Camera: Minolta Freedom III

Comments: Another view of tank processing area.

Department of Health and Environment
Division of Environment
Central District Office, Salt Lake City
PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc.

Location: City Wichita County SG Legal: _____ S-____, T-____ S, R _____ E
W

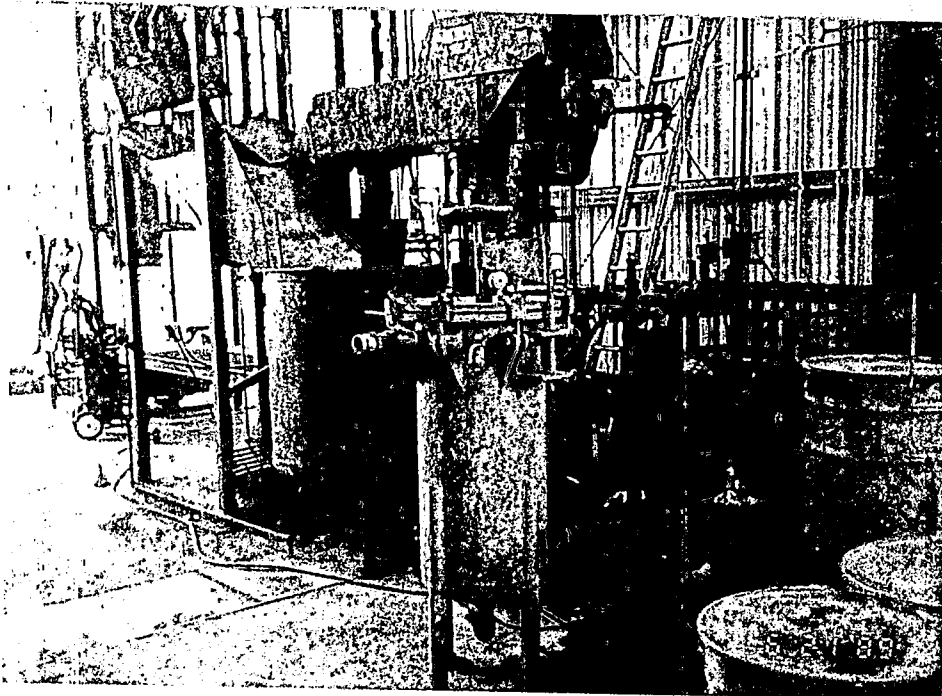


Photo No. 5 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: NW

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Blending unit

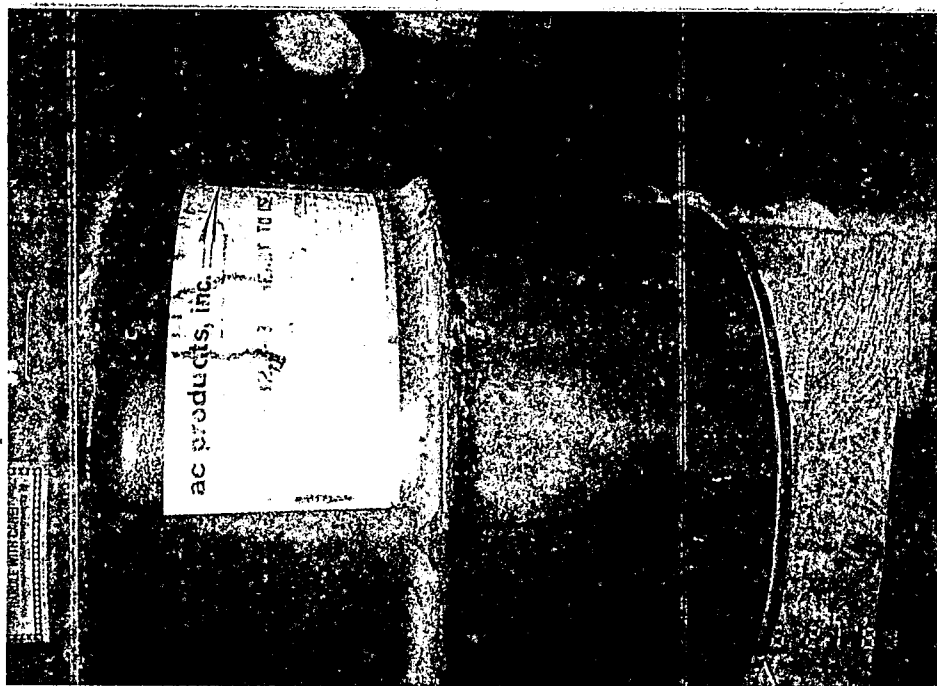


Photo No. 6 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: _____

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Drum from plastic

Fabricating Co., in

Warehouse C.

Small seep at bottom
rim.

Department of Health and Environment
Division of Environment
Central District Office, Salt Lake City
PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc.

Location: City Wichita County SG Legal: _____ S-_____, T-_____, R-_____ E
W



Photo No. 7 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: NE

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Warehouse 'C'

Photo No. 8 Time: _____ Hrs.

Date: 6-21-89 Day: _____

By: Dale T. Stuckey

General Direction Faced: SE

Weather Conditions: _____

Type of Camera: _____

Minolta Freedom III

Comments: _____

Warehouse 'C'

Department of Health and Environment
Division of Environment
The Central District Office, Salt Lake City
PHOTO MOUNTING SHEET

Name of Site: Hydrocarbon Recyclers, Inc.
Location: City Wichita County SG Legal: _____ S-____, T-____ S, R-____ E
W



Photo No. 9 Time: _____ Hrs.
Date: 6-21-89 Day: _____
By: Dale T. Stuckey
General Direction Faced: East
Weather Conditions: _____
Type of Camera: Minolta Freedom III
Comments: _____

Truck unloading area

Photo No. _____ Time: _____ Hrs.
Date: 6-21-89 Day: _____
By: Dale T. Stuckey
General Direction Faced: _____
Weather Conditions: _____
Type of Camera: Minolta Freedom III
Comments: _____

1. EPA ID: KSD007246846 HRI
2. FACILITY NAME: Hydrocarbon Recyclers
3. CITY: Wichita COUNTY: SG
4. - No EPA ID: ☐
6. DATE OF INITIAL EVALUATION WHICH
IS THE BASIS FOR THIS REPORT:
6/21/89 INSPECTOR: Teresa Hansen
Dale T. Sturkey
Martin West

5. FACILITY TYPE:
☒ TSD ☐ GEN
☐ KG ☐ SQ
☐ TRANSPORTER
☐ NOT-A GENERATOR
GOVERNMENT FACILITY: ☐ PUT F, S, OR L
IN BOX
F - FEDERAL S - STATE L - LOCAL

EPA COMPLETES
THIS BLOCK
☐ GWM ☐ SNC

7. TYPE OF EVALUATION COVERED
BY THIS REPORT:
PUT CODE IN BOX
CHOOSE ONE ☐ 1
1 = COMPLIANCE EVALUATION INSPECTION (CEI)
2 = SAMPLING INSPECTION
3 = RECORD REVIEW
4 = COMPLIANCE GWM EVALUATION (CME)
5 = COMPLIANCE SCHEDULE EVALUATION (CSE)
11 = CASE DEVELOPMENT INSPECTION
12 = OPERATION AND MAINTENANCE EVALUATION

8. DATE OF EVALUATION COVERED BY THIS REPORT
(ENTER ONLY IF DIFFERENT FROM 6.): 7-10-89 (UPDATE)

9. AREA AND CLASS OF VIOLATION (ENTER NUMBER OF VIOLATIONS BY AREA AND CLASS): CL 7-17-89
HWOMS 7-17-89

CLASS OF VIOLATION	AREA OF VIOLATION														
	NOT.	PRE-TRANS.	ACCUM. 90 D.	GEN FAC. STANDARDS	PREP & PREVENT	CONT. & E.P.	STOR. COND.	GWM/RLS	CE/PCL	FIN REQ	PART B	COMP SCH.	MAN RPT	LAND BAN	OTHER
I	0	0	0	0	0	0			0	0			0	0	0
II							X								X

10. ENFORCEMENT ACTIONS FOR VIOLATIONS: 7-3-89

AREA OF VIOLATION	TYPE OF ACTION TAKEN (CIRCLE ONE)				DATE ACTION TAKEN (MDY)	COMPLIANCE DATES (MDY)		PENALTY	
						SCHEDULED	ACTUAL	ASSESSED	COLLECTED
<u>stor. cond.</u>	INFORMAL	<u>WL/NOV</u>	AO	CIVAC CRIMAC	<u>7/3/89</u>	<u>7/26/89</u>	<u>7/3/89</u>		
	INFORMAL	WL/NOV	AO	CIVAC CRIMAC	<u>7/3/89</u>	<u>7/3/89</u>	<u>7/3/89</u>		
	INFORMAL	WL/NOV	AO	CIVAC CRIMAC	<u>7/3/89</u>	<u>7/3/89</u>	<u>7/3/89</u>		
	INFORMAL	WL/NOV	AO	CIVAC CRIMAC	<u>7/3/89</u>	<u>7/3/89</u>	<u>7/3/89</u>		

COMMENTS: EIGHTY CHARACTER LIMIT.

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